

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ANN PHILLIPS,

and

**BRITTANI RILEY,
individually and on behalf of
all others similarly situated,**

Plaintiffs,

CASE NO. 18-cv-1563

v.

NAVITUS HEALTH SOLUTIONS, LLC,

Defendant.

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEY FEES AND
COSTS**

Pursuant to the Court's Order granting preliminary approval of the Parties' Settlement Agreement (ECF No. 30), 29 U.S.C. §216(b), and Fed. R. Civ. P. 23, Plaintiffs, by and through their attorneys, Hawks Quindel, S.C., hereby respectfully petition the Court for an award of attorneys' fees and costs as set forth below and on the grounds set forth in Plaintiffs' supporting brief, as well as the accompanying declarations of Attorneys Summer H. Murshid, Brenda Lewison, Rebecca Salawdeh, and Scott Luzi.

1. Class Counsel has negotiated a settlement on behalf of the FLSA Collective Classes' Members and the Rule 23 Classes' Members that are outlined in

the Parties' Settlement Agreement and worked for Defendant during the relevant statutory periods;

2. The settlement creates a total, common settlement fund of \$854,000. Plaintiffs petition the Court for a recovery of 33.33% of the common fund for attorneys' fees, in the amount of \$284,666.67. Additionally, Plaintiffs petition the Court for \$23,596.75 in costs, for a total of \$308,263.42.

3. As set forth in greater detail in Plaintiffs' supporting brief, the requested attorneys' fees and costs are reasonable and consistent with the market rate in similar cases.

WHEREFORE, Plaintiffs respectfully request that the Court award attorneys' fees and costs as set forth above during the telephonic fairness hearing set for May 14, 2020 at 11:00 am.

Dated this 23rd day of April, 2020.

Respectfully submitted,

s/ Summer H. Murshid

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